

**OCONEE COUNTY
EARLY ACTION COMPACT**

**GROUND-LEVEL OZONE
EMISSION REDUCTION PLAN**

**ADOPTED
FEBRUARY 17, 2004**

Oconee County Early Action Plan for the 8-Hour Ozone Standard

Executive Summary

Although all areas within its boundaries are currently in attainment of the 8-hour National Ambient Air Quality Standard for Ozone, Oconee County recognizes that a jurisdiction's air quality is often affected by emissions originating in other regions. And, as exposure to ground-level ozone has been identified as a serious health concern, all local governments share in the responsibility of working to reduce ozone-causing emissions. Oconee County therefore committed to act as a partner in the South Carolina Early Action State Implementation Plan by signing an Early Action Compact on December 3, 2002. As such, the County will act to reduce emissions that cause ground-level ozone prior to deadlines mandated under the Clean Air Act. This plan establishes the reduction strategies Oconee County will implement.

Two groups of gasses combine with strong sunlight to create ground-level ozone, volatile organic compounds (VOC's) and nitrogen oxides (NOx). In Oconee County, the primary sources of VOC's are found in the natural environment, and would therefore be difficult to reduce. NOx, however, stems primarily from manmade sources, such as combustion engines and industrial processes, and may be more easily controllable. In Oconee County, the primary source of NOx can be found in exhaust from automobiles.

Oconee County has chosen implement a series of reduction strategies designed to reduce emissions from county-owned vehicles, equipment, and facilities, while educating and encouraging its citizens to do likewise. And though potentially challenged by public attitudes and limited resources, it is believed that these steps will over time effect a significant reduction in emissions in Oconee County. The chosen strategies include upgrading county vehicles and equipment through its recently begun Capital Improvements Plan, maintaining and constructing county facilities in the most energy-efficient manner practicable, implementing greenspace requirements in the county's subdivision regulations, assisting municipalities in their efforts to reduce emissions, and dissemination of ozone-related information to stakeholders and the general public. When combined with steps taken by the state and federal governments, as well as those of other local jurisdictions, the emissions reductions achieved by Oconee County's efforts will help further the goal of improved air quality for areas both inside and outside county borders.

Background

In 1997, the Environmental Protection Agency (EPA) revised the National Ambient Air Quality Standard (NAAQS) for Ozone from a one-hour standard to an 8-hour standard. This was done to reflect the latest understanding of the effects of ozone exposure and provide public health protection with adequate margin of safety. EPA will be designating areas as attainment (meeting the standard) or non-attainment (not meeting the standard) in April of 2004. This designation will be based on the most recent three years of monitoring data (i.e., 2001, 2002, 2003). The Department of Health and Environmental Control (DHEC) has an intensive monitoring network covering the state and routinely monitors for ozone during the months of April through October. This time period is often referred to as the “Ozone Season.” If an area is designated non-attainment, the Clean Air Act (CAA) requires states to revise their State Implementation Plan (SIP) outlining how the area will return to attainment within a certain time period. If EPA designates areas in South Carolina as non-attainment in April of 2004, a revision to the South Carolina SIP will be due no later than 2007. Additionally, once an area is designated as non-attainment, the CAA has specific requirements that must be implemented. These requirements affect industry, economic development, and transportation. One requirement, Non-attainment New Source Review sets out the level of emissions reductions required for new and modified industrial facilities. Another requirement of non-attainment areas is to coordinate local transportation and air quality planning to ensure that transportation plans, programs and projects are consistent with air quality goals. According to the CAA, transportation plans, programs, and projects cannot create new violations of the Federal air quality standards; increase the frequency or severity of existing violations of the standard; or, delay attainment of standards.

The above approach is commonly referred to as the “traditional” approach. While safeguards for areas to return to attainment are included, certain prescriptive requirements may not be appropriate for all areas designated non-attainment for the 8-hour ozone standard. As a result, EPA provided an option for areas that were meeting the one-hour standard to attain the 8-hour ozone standard by December 31, 2007, and obtain cleaner air sooner than currently federally mandated. This option offers a more expeditious time frame for achieving emissions reductions, while providing “fail-safe” provisions for the area to revert to the traditional SIP process if specific milestones are not met. EPA will move forward with the designation process (attainment or non-attainment) but will defer the effective date, thus the prescriptive requirements of non-attainment designations, provided all terms and conditions of an Early Action Compact (EAC) are being met. A copy of the Oconee County EAC is included as Attachment A.

Forty-five counties in South Carolina elected to participate in the development of an Early Action State Implementation Plan (EAP). On December 3, 2002, Ann H. Hughes, County Supervisor, signed an Early Action Compact (EAC) for Oconee County. Participants in the EAC include the county, DHEC and the EPA. All of these parties agree to work together to implement federal, state and local emissions control measures that will allow the non-attainment areas to attain the 8-hour ozone standard earlier and therefore avoid implementing costly prescriptive measures. The EAC requires that all counties submit a local Early Action Plan to DHEC by March 31, 2004.

Although Oconee County is currently not designated as a non-attainment area for the 8-hour ozone standard, other areas in South Carolina may be. As air knows no boundaries, implementation of emission reduction strategies and support of federal and state rules and regulations by Oconee County will help to provide cleaner air sooner to citizens of South Carolina.

What is Ozone?

Ozone is a gas that occurs both in the Earth's upper atmosphere and at ground level. Ozone is one of six criteria pollutants used by the EPA as an indicator of air quality. Depending on where ozone is found, it can be good or bad. Occurring naturally in the upper atmosphere, ozone acts as a shield from the sun's harmful ultraviolet rays. However, ground-level ozone is a concern during the summer months when the weather conditions are favorable for producing ozone. Ozone is formed by chemical reactions between volatile organic compounds (VOCs) and oxides of nitrogen (NOx) in the presence of sunlight. Ozone is a major ingredient of smog.

Ozone Health Effects

Ozone can cause permanent damage to the respiratory system. Active children are at highest risk from ozone exposure because they often spend a large amount of time outdoors. Active adults of all ages who exercise or work outdoors have an increased risk of exposure to elevated levels of ozone. People with asthma or other respiratory diseases are particularly sensitive to ozone exposure. The following 2002 statistics are for Oconee County and were collected by the Bureau of Epidemiology at DHEC:

- ?? 9.3 percent of adults suffer annually from asthma;
- ?? 86 hospitalizations were due to asthma;
- ?? 103 children under the age of 18 visited the Emergency Room due to asthma; and,
- ?? Asthma is the leading cause of hospitalization for children under the age of 18.

Sources of NOx and VOCs

NOx and VOCs come from emissions from the following sources: stationary, area, mobile and natural. Stationary sources include larger permitted industry and power plants. Area sources are small, stationary and non-transportation sources that collectively contribute to air pollution. Area sources include gas stations (emit NOx) and dry-cleaners (emit VOCs). Mobile sources are divided into two categories, on-road and off-road. The off-road mobile sources include trains, ships, boats, airplanes, lawn equipment, and construction equipment. On-road mobile sources include cars, trucks, and buses. Natural sources for VOCs are released from vegetation, mostly trees in South Carolina. Natural sources for NOx are very rare and include emissions from soil, lightning, and oceans. The following figures for Oconee County show the percentage of sources by category for NOx (Figure 1) and VOCs (Figure 2).

Figure 1-NOx

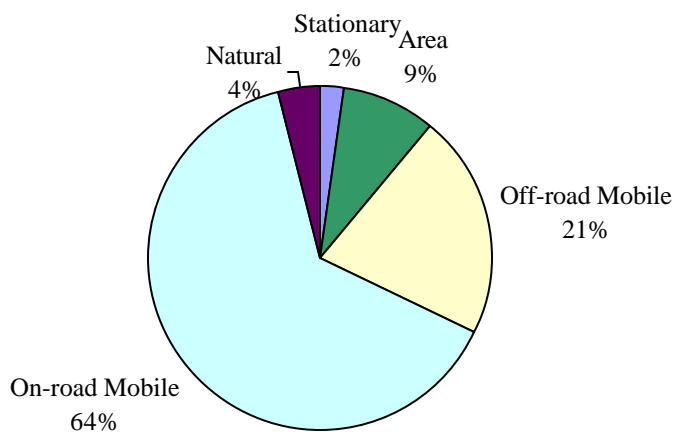
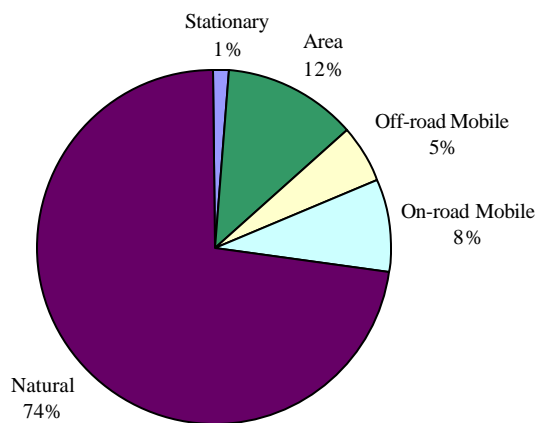


Figure 2 - VOC



Emissions of NO_x and VOC are precursors to the formation of ozone. South Carolina is sometimes referred to as “NO_x limited.” This means that small amounts of NO_x enable ozone to form rapidly when VOC levels are relatively high, but ozone production is quickly limited by the removal of NO_x. Under these conditions, NO_x reductions are highly effective in reducing ozone while VOC reductions have little effect. Figure 1 shows that 62 percent of the NO_x emissions is from on-road mobile sources. With such a high percentage of NO_x coming from on-road sources, it would appear that reductions from mobile sources would be beneficial.

Demographics

Oconee County’s area is approximately 670 square miles, with a population of 66,215 according to the 2001-2002 South Carolina Statistical Abstract. The population density is approximately 99 persons/mile². There are a total of approximately 834 miles of interstate, state primary and state secondary roads in the county. The number of registered vehicles in Oconee County was 59,444, ranking the county 17th among the other counties in South Carolina for number of registered vehicles.

Of Oconee County’s total population, 29,544 people over the age of 16 are employed. Of those employed, 28,936 people commute to work. The distribution of commute choices is identified on Table 1.

Table 1		
Distribution of Commute Choices of Employed Over the Age of 16 in Oconee County		
Commute Choice	Number Employed	Percentage
Drove alone	23,849	80.7
Carpooled	4,354	14.7
Worked at home	608	2.1
*Other	287	1
Walked	365	1.2
Public Transportation	81	0.3

*Other includes motorcycles, bicycles and other means of transportation not identified.

Industry

Attachment B contains a list of the industry within Oconee County and the most recent annual emission figures.

Public Involvement

Oconee County has begun efforts to encourage public involvement in reducing emissions in various ways. Area municipalities were informed of the effort in the early stages of plan development, and invited to participate. Currently, few have pursued the issue, but it is hoped that, over time, several towns will take an active role in emissions reduction. Also, a range of proposed reduction strategies have been presented in open forums such as Planning Commission meetings, community informational meetings, and County Council committee meetings. These sessions have resulted in significant media coverage, and have

sparked numerous contacts between the Ozone Action Coordinator and various stakeholders. The input gathered from these discussions was used when considering the merits of the reduction strategies.

A formal stakeholder group will be formed to educate and inform the general population. Informational meetings will be held, with local media encouraged to publicize the County's efforts. Other outreach efforts focused on providing the public with easy access to information about ground-level ozone will include a web page with both detailed information, and links to current ozone levels.

Emission Reduction Strategies

Through the development and implementation of this plan, Oconee County will implement local emission reduction strategies that are economically feasible and that make sense for the county. In doing so, the efforts of Oconee County should assist the state in achieving the 8-hour ozone standard by December 31, 2007, and maintaining the standard beyond 2012.

A number of federal control measures are in place and/or will be phased in over the next several years. These programs include the Tier II and Low Sulfur Gasoline and also the NO_x SIP call. All of these programs have been developed to help areas attain air quality standards.

The state is also proposing new and/or modifications to regulations that will assist non-attainment areas. The State programs could include a Best Available Control Technology (BACT) regulation; modifications to the open burning regulations and a process to assure transportation plans, programs, and projects consider air quality goals.

Local measures must be implemented no later than April 2005. However, Oconee County will continue to address strategies that will assist in long-term maintenance of the 8-hour ozone standard. It is not possible to determine emissions reductions for each of the following strategies. However, directionally sound strategies have been selected and the county anticipates the cumulative impact of adopting each of these strategies will assist in maintaining the standard.

Attachment C is a list of the emission reduction strategies that will be implemented by Oconee County.

Challenges

Oconee County will be faced with challenges regarding the implementation of emissions reduction strategies. Behavior modification will be one of the challenges faced. Oconee County, through the efforts of the Ozone Action Coordinator and stakeholders, hopes to educate local citizens on the air quality standards and the implications of not meeting the standards. Once education efforts begin, the county anticipates behavior modifications by local citizens. It will be through the joint efforts of local government, private citizens, business, and industry that Oconee County will be able to assist the state in meeting and maintaining the 8-hour ozone standard.

An additional challenge lies in the availability of staff and budget to devote to the task. Currently, the duties of Ozone Action Coordinator are assigned to existing staff in the Planning Department. In the event that Oconee County is determined to be in "non-attainment" of the 8-Hour Standard, resources will merit review.

Maintenance

Local measures must be implemented no later than April 2005. However, as previously mentioned Oconee County will continue to address strategies that will assist in long-term maintenance of the 8-hour ozone standard. DHEC will continue to provide the air quality monitoring necessary to determine attainment of the 8-hour ozone standard. Yearly, at the end of each ozone season, Oconee County will review and evaluate the effectiveness of the strategies adopted. If necessary, additional emission reduction strategies may be adopted. Once the standard is reached in December 2007, and non-attainment designations are replaced with attainment designations, Oconee County will continue to evaluate the effectiveness of the strategies adopted and adjust emission reduction strategies where needed. Maintenance of the standard will depend upon the success of emission reduction strategies implemented by Oconee County and surrounding counties as well as federal and state initiatives.

Attachment A

Oconee County Early Action Compact

SOUTH CAROLINA'S 8-HOUR OZONE EARLY ACTION COMPACT Oconee County

The United States Environmental Protection Agency (EPA) has provided an option for areas currently meeting the 1-hour ozone standard, like those in South Carolina, to attain the 8-hour ozone standard by December 31, 2007, and obtain cleaner air sooner than federally mandated. This option offers a more expeditious time line for achieving emissions reductions than expected under the EPA's 8-hour ozone implementation rulemaking, while providing "fail-safe" provisions for the area to revert to the traditional State Implementation Plan (SIP) process if specific milestones are not met. Through the development of this Early Action Compact (EAC), local, state, and EPA officials agree to work together to develop and implement local and state early action plans. The plans will become a part of the state early action SIP to reduce ground-level ozone concentrations to comply with the 8-hour ozone standard by December 31, 2007, and maintain the standard beyond that date. Failure to meet the obligations outlined in this EAC will result in immediate reversion to the traditional non-attainment designation process as required in the Clean Air Act (CAA).

In an effort to provide this information to areas within South Carolina, the South Carolina Department of Health and Environmental Control (DHEC) held six public meetings throughout the state. The locations of the meetings were targeted to areas that could potentially be designated as non-attainment for the 8-hour ozone standard. The meetings were held in Columbia, Greenville, Florence, Rock Hill, Aiken and Charleston. EPA officials participated in five of the six meetings. The general public, local government representatives, industry representatives, and environmental interest groups attended the meetings. Prior to the meetings, DHEC issued a press release regarding the development of an early action SIP. Correspondence including a fact sheet was sent to all county administrators, Councils of Governments, Metropolitan Planning Organizations, public interest groups, industry representatives, other state agencies and others determined to be stakeholders in the process.

The Parties to this (EAC) are: Oconee County, South Carolina Department of Health and Environmental Control (DHEC) and EPA.

I. General Provisions

- A. The parties commit to develop, implement and maintain the early action SIP (which includes the local early action plans) providing EPA defers the effective date of the non-attainment designation and related requirements as long as all conditions of the EAC and key milestones are met.
- B. If the potential area of non-attainment does not meet all the terms of the EAC, then it will forfeit its participation and will be subject to the full planning requirements under applicable CAA

traditional SIP processes including requirements defined as part of the EPA's 8-hour ozone implementation rulemaking.

- C. If the area has had the effective date of a non-attainment designation deferred and the area does not reach attainment of the standard by December 31, 2007, then the non-attainment designation will be effective. If the EPA's implementation schedule also requires a traditional SIP from areas on or before December 31, 2007, then a traditional SIP revision demonstrating attainment by the new attainment date will be due for the non-attainment area no later than December 31, 2008.
- D. Before formal adoption into the early action SIP, this agreement may be modified or terminated by mutual consent of all parties, or any party may withdraw from the agreement by notifying other parties in writing. If a party's withdrawal from the agreement prevents remaining signatories from satisfying any of the terms and milestones of the original agreement, the agreement will be void, any deferred effective date of the non-attainment designation would be withdrawn and the area's non-attainment designation would become effective soon after. Upon termination or withdrawal from the EAC, the area will be subject to the full planning requirements under applicable CAA traditional processes including requirements defined as part of the EPA's 8-hour ozone implementation rulemaking. The local government signatories will approve the local early action plans before submittal to DHEC for inclusion in the early action SIP. Once the local early action plan is incorporated into the early action SIP, any modifications will be treated as SIP revisions.
- E. Execution of this EAC by each Party shall be by signature of each Party's authorized representative. This agreement remains in effect until December 31, 2007.

II. Early Action Compact Requirements

- A. **Milestones and Reporting**
DHEC and local areas will assess progress towards developing and implementing the early action SIP and make a report available to EPA and the public every six months beginning in June 2003. As per EPA guidance, the key milestones for participation in the EAC are identified in the following table.

Local Plan /Early Action SIP Milestones		
DATE	MILESTONE	RESPONSIBILITY
December 31, 2002	EAC signed by all parties and submitted to EPA	Local/State/EPA
June 16, 2003	Discussion of control measures being considered to EPA	Local/State
March 31, 2004	Final local early action plan submitted to DHEC; copy to EPA	Local
December 31, 2004	Early Action State Implementation Plan submitted to EPA for incorporation into SIP	State
April 1, 2005	Local/State control strategies implemented no later than this date	Local/State
September 30, 2005	EPA takes final action on SIP submitted December 31, 2004	EPA
June 30, 2006	State submits progress report to EPA	State
December 31, 2007	Attainment of the 8-hour ozone standard	Local/State

B. Emissions Inventories

1. DHEC will be responsible for developing emissions inventories.
2. An initial modeling emissions inventory will be completed by December 31, 2002. This inventory includes:
 - a. Emissions modeling data for a 1998 episode that is representative of a typical ozone season exceedance that meets the EPA episode selection guidance;
 - b. MOBILE6 for determining on-road mobile emissions;
 - c. NONROAD model data; and,
 - d. Area source database utilizing population data allocated statewide.
3. A 2007 future year modeling emissions inventory will be developed by March 31, 2004. This inventory will sufficiently account for projected future growth in ozone precursor emissions through 2007, particularly from stationary, non-road and on-road mobile sources.
4. Additional inventories will be contingent upon legislative appropriations or other funding. Selection of specific episode inventories will be partially determined by the conceptual model, which reflects an analysis of meteorological conditions typical of high ozone events.
5. Emissions inventories will be compared and analyzed for trends in emission sources over time. The emissions inventory comparison and analysis will be completed by December 31, 2003.

C. Modeling

1. DHEC will be responsible for conducting the meteorological and air quality modeling analysis. DHEC will conduct the modeling analysis based on the "Draft Guidance on the use of Models and Other Analyses in Attainment Demonstrations for the 8-Hour Ozone NAAQS" (EPA-454/R-99-004, May 1999). The modeling will follow the guidance as facilitated by the EPA Regional Office.
2. Base case modeling will be completed by December 31, 2002. Future case modeling will be completed by October 31, 2003. One or more modeled control cases will be completed by January 31, 2004, with final revisions completed by March 31, 2004. All modeling will:
 - be SIP quality and perform within EPA's accepted margin of accuracy;
 - be carefully documented;
 - sufficiently account for projected future growth in ozone precursor emissions;
 - be accomplished by DHEC and reviewed by EPA; and,
 - be used to determine the effectiveness of NO_x and/or VOC reductions. The control case(s) will be used to determine the relative effectiveness of different emission reduction strategies and to aid in the selection of appropriate emission reduction strategies.

D. Control Strategies

1. All adopted Federal and State control strategies that have been or will be implemented by the December 31, 2007, attainment date will be included in base, future and control case modeling.
2. Additional local and state control strategies under consideration will be identified by June 16, 2003. The local and state control strategies selected will be implemented as soon as practical, but no later than April 1, 2005.
3. Local and state control strategies will be specific, quantified, permanent and enforceable. The strategies will also include specific implementation dates and detailed documentation and reporting processes.
4. Voluntary strategies can play a supporting role in the local early action plan and the early action SIP. If emission reductions from voluntary strategies are quantified and credit is taken for them in the local early action plan or the early action SIP, those emission reductions will be enforceable. Additional strategies must be implemented to meet those quantified reduction requirements if quantified voluntary strategies fail. This is true for all quantified emission reductions.
5. Local and state control strategies will be designed and implemented with full stakeholder participation.

6. Local and state control strategies will be incorporated by DHEC into the early action SIP. In the event that the local area desires to add, delete or substitute strategies after early action SIP submittal, the local area will request a modification. Local early action plan modifications will be treated as SIP revisions and facilitated by DHEC.

E. Maintenance for Growth

1. The early action SIP will include a component to address emissions growth at least five years beyond December 31, 2007, ensuring that the areas will remain in attainment of the 8-hour ozone standard during that period. Attainment maintenance analysis will be completed by January 31, 2004, with final revisions completed by March 31, 2004. The analysis will employ one or more of the following or any other appropriate techniques necessary to make such a demonstration:
 - a. Modeling analysis showing ozone levels below the 8-hour ozone standard in 2012;
 - b. An annual review of growth (especially mobile and stationary source) to ensure control measures and growth assumptions are adequate;
 - c. Identification and quantification of federal, state, and/or local measures indicating sufficient reductions to offset growth estimates; or,
 - d. Any other appropriate techniques necessary to make such a determination.
2. The early action SIP must also detail a continuing planning process that includes modeling updates and modeling assumption verification (particularly growth assumptions). Modeling updates and planning processes must consider and evaluate the following:
 - a. All relevant actual new point sources;
 - b. Impacts from potential new source growth; and,
 - c. Future transportation patterns and their impact on air quality in a manner that is consistent with the most current adopted Long Range Transportation Plan and most current trend and projections of local motor vehicle emissions.
3. If the review of emissions growth in conjunction with the continuing planning process demonstrates that adopted emission reduction strategies are inadequate to address growth in emissions, additional measures will be added to the early action plan. Local planning processes should prepare for this possibility.
4. In the event that the continuing planning process identifies the need to add, delete, or substitute control strategies after the local early action plan has been incorporated into the early action SIP, the local area will initiate, and DHEC will facilitate a SIP revision to accommodate changes.

F. Public Involvement

1. Public involvement has been and will continue to be strongly encouraged during the planning and implementation process.
2. Public awareness programs will be used to provide opportunities for involvement in the planning process, implementation of control strategies, and any other issues important to the area.
3. Interested stakeholders (i.e., local, state, and federal government, citizens, public interest groups, and the business community) will continue to be involved in the planning process as early as possible. Planning meetings will be open to the public, with posted meeting times and locations. Early action SIP drafts will be publicly available, and the drafting process will have sufficient opportunities for comment from all interested stakeholders.
4. Opportunities for public comment on the proposed early action SIP will be provided and will follow the traditional SIP revision process as implemented by DHEC.
5. Semi-annual reports detailing, at a minimum, progress toward key milestones, will be made available to the public.
6. DHEC has established and will maintain a website for South Carolina's Early Action Plan for the 8-hour ozone standard, located at www.scdhec.net/baq/eap.html.

III. Local Government Responsibilities

The local governments agree to develop and implement a local early action plan that will promote the area's attainment by December 31, 2007, of the 8-hour ozone standard and maintenance until at least 2012. The local governments will develop this plan in coordination with the DHEC, EPA, stakeholders and the public. The local early action plan will include a process to evaluate the effectiveness and maintain long-term compliance with the standard.

After all adopted Federal and State controls that have been or will be implemented by the attainment date of December 31, 2007, are accounted for in the modeling, the local area must adopt additional local controls, as necessary to demonstrate attainment of the 8-hour ozone standard by December 31, 2007. Local controls under consideration must be identified and described by June 16, 2003. These measures must be included in the semi-annual report made available to the public.

The draft local early action plan will be submitted to DHEC by August 31, 2003. The final local early action plan will be submitted to DHEC, with a copy forwarded to EPA, by March 31, 2004. The adopted local early action plan will be included in the early action SIP due December 31, 2004.

In the event a development or issue arises that may impact performance or progress toward key milestones (including if a key milestone will be or has been missed and/or if a termination or modification has been requested), the responsible party will notify all other signatories in writing as soon as possible.

IV. The South Carolina Department of Health and Environmental Control

DHEC agrees to develop and implement a state early action SIP that will demonstrate the participating area's attainment by December 31, 2007, of the 8-hour ozone standard and maintenance until at least 2012. DHEC will develop this plan in coordination with the local governments, EPA, stakeholders and the public. The state early action SIP will include a process to monitor and maintain long-term compliance with the standard.

It is the responsibility of each state under the CAA to ensure attainment with all National Ambient Air Quality Standards. At any such time that an area is deemed non-attainment, the state will be required to develop a plan to return the area(s) to attainment in accordance with the CAA. If applicable, South Carolina is committed to working with adjacent states to assure mutual attainment of national standards.

In the event a development or issue arises that may impact performance or progress toward key milestones (including if a key milestone will be or has been missed and/or if a termination or modification has been requested), DHEC will notify all other signatories in writing as soon as possible.

DHEC will provide support to areas throughout the planning and implementation process by:

1. Developing emission inventories, modeling, trend analysis, and quantification and comparison of control measures.
2. Providing necessary information on all federal and state adopted emission reduction measures, which affect the area.
3. Providing technical and strategic assistance, as appropriate, in the selection and implementation of control strategies.
4. Providing technical and planning assistance in developing and implementing processes to address the impact of emissions growth beyond the attainment date.
5. Maintaining monitors and reporting and analysis of monitoring data.
6. Promoting public awareness efforts.
7. Coordinating communication between local areas and the EPA to facilitate continuing the EPA review of local work.
8. Ensuring expeditious review of local early action plan(s), and if deemed adequate, proposing modification of the early action SIP to adopt the early action plan.

9. Adopting control measures into the early action SIP as expeditiously as possible. The final complete early action SIP revision must be completed, adopted, and submitted by the state to the EPA by December 31, 2004.
10. Tracking progress. If any milestone is missed and EPA withdraws the deferred effective date, thereby triggering a non-attainment designation and applicable statutory requirements, the state will strive to submit a traditional non-attainment SIP within one year. However, due to the South Carolina legislative review process, it may take at least eighteen months.
11. Working concurrently with areas not electing to participate in the early action SIP process in preparing the traditional SIP submittal as required by the CAA.

V. The Environmental Protection Agency

The EPA will participate by:

1. Recognizing the local area's and state's commitment to voluntarily adopt an early, substantive, enforceable, and scientifically-based attainment plan with early implementation of control measures by becoming a party to the EAC developed in conformance with South Carolina's Protocol for Early Action Compacts.
2. Providing technical assistance to the state(s) and local area(s) in the development of the early action plan.
3. Reviewing and approving the completed early action SIP by no later than September 30, 2005.
4. Deferring the effective date of non-attainment designation and related requirements for participating areas that fail to meet the 8-hour ozone standard as long as all terms and key milestones of the EAC are being met, including submission of the early action SIP revision by December 31, 2004.
5. Designating the area expeditiously as attainment and imposing no additional requirements, provided that the monitors in the area reflect attainment by December 31, 2007.
6. Taking action to withdraw the deferred effective date if the area violates the standard as of December 31, 2007, and the area has had the effective date of its non-attainment designation deferred. The area's non-attainment designation will become effective soon after.
7. Ensuring appropriate credit in the traditional SIP process for all emissions reductions from measures implemented in the early action SIP if the area does not meet all the terms of the EAC; including meeting agreed-upon key milestones and is designated (or re-designated if necessary) according to the EPA's 8-hour ozone implementation guidelines. The EPA will offer such an area no delays, exemptions, or other favorable treatment because of its participation in the EAC.

8. Not allowing any area to renew their EAC after December 31, 2007, or initiate a new compact if it has previously forfeited its participation.

VI. Signatures

United States Environmental Protection Agency

Title

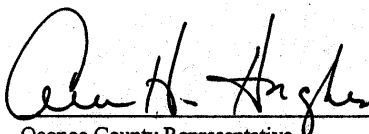
Date

South Carolina

Department of Health and Environmental Control

Title

Date


Oconee County Representative

Co Supervisor
Title

12/03/02
Date

Attachment B
Major Industries in Oconee County

?? West Point Stevens, Inc.	Textiles
?? Duke Energy Corporation	Energy
?? Schlumberger SEMA	Electronic Measuring Devices
?? Schneider Electric/Square D Company	Motor Control Centers
?? Dunlop Slazenger Group	Sports Equipment
?? Kendall Healthcare Product Company	Healthcare-related Fabrics
?? Englehard Corporation	Precious Metal Catalyst
?? Timken Corporation	Bearings
?? Kennametal IPG	Twist Drills
?? U.S. Engine Valve Corporation	Engine Valves
?? BP Fabrics & Fibers	Non-woven Fabric
?? BorgWarner Automotive, Inc.	Automotive Components
?? Jacobs Chuck Manufacturing	Drill and Tap Chucks

Attachment C

Oconee County

Emission Reduction Strategies

Measure	Description	Current assessment of emission reductions	Implementation Date	Geographic area and/or local government
Ozone Action Coordinator	Designation of county staff person to coordinate education efforts and dissemination of ozone related information	Directionally Sound	July 2003	Countywide
Ozone Reduction Meetings	Coordination of meetings with municipalities, stakeholder groups, the public, and other entities	Directionally Sound	2004	Countywide
Lower Emissions in County Fleet	Utilize Capital Improvement Plan to initiate annual review of vehicle and equipment fleet. Upgrade and replace older, less-fuel efficient vehicles and equipment as budget allows; replace improperly operating catalytic converters.	Directionally Sound	2003	County Government
Energy-efficient Buildings	Utilize Capital Improvement Plan to initiate annual review of needed upgrades to county-owned buildings and facilities. Resulting construction and maintenance projects to result in highest level of energy-efficiency practical for the structures.	Directionally Sound	2003	County Government

Reduce Speeding on Highways	County shall support efforts by County Sheriff to emphasize speed and traffic control (this may or may not include expansion of Traffic Control Division of Sheriff's Department)	Directionally Sound	2004	Countywide
Greenspace Regulations	Amend Land Development and Subdivision Regulations to require minimum areas of greenspace and trees in all new county-approved subdivisions	Directionally Sound	2004	Countywide
Include Ozone Reduction in Comprehensive Plan	Include emission reduction efforts as a major goal in the updated Comprehensive Plan	Directionally Sound	2004	Countywide
Intergovernmental Cooperation	Encourage and assist municipalities in taking an active role in countywide emission reduction efforts. This may include supporting efforts by municipalities to develop and expand mass transportation facilities	Directionally Sound	2004	Countywide